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REMARKS

This response is intended as a full and complete response to the Office Action dated May 4, 2005. In view of the following discussion, the Applicant believes that all claims are in allowable form.

IN THE SPECIFICATION

The Applicant has amended paragraph [0018] to capitalize the trademark RIGA-FLO® as suggested by the Examiner

CLAIM AMENDMENTS

Claims 15-17 and 24-27 have been amended to as suggested by the Examiner to clarify antecedent basis and to correct a typographical error.

CLAIM REJECTIONS

A. 35 U.S.C. §102(b) Claims 1-4, 9, 12-14, 16-19 and 21

Claims 1-4, 9, 12-14, 16-19 and 21 stand rejected as being anticipated by United States Patent No. 6,319,300, issued November 20, 2001, to *Chen* (hereinafter referred to as "*Chen*"). In response, the Applicant has amended claims 1 and 21 to more clearly recite aspects of the invention.

Independent claims 1 and 21, as amended, recite limitations not taught or suggested by *Chen*. In the embodiment cited by the Examiner, *Chen* teaches filter assembly having two plates 31, 32 mounted to the upper and lower edges of a filter sheet 29. As shown in Figures 11-13, the plates 31, 32 do not completely engage the pleats of the filter sheet 29, and as such, do not provide a "seal" between the filter sheet and the frame of the filter assembly 11. Therefore, *Chen* does not teach or suggest a first compressible seal element disposed on a first side of an edge of a media pack and engaged with a frame assembly, and a second seal element disposed on a second side of the edge of the media pack and engaged with the frame assembly, wherein the second seal member biases the edge of the media pack against the first seal element, as recited by claim 1. Additionally, *Chen* does not teach or suggest a first pair of seal elements

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disposed in a frame assembly and clamping a first open end of a media pack, and a second pair of seal elements disposed in the frame assembly and clamping a second open end of the media pack, wherein at least one of the first pair of seal elements and at least one of the second pair of seal elements are compressible, as recited by claim 21.

Thus, the Applicant submits that independent claims 1 and 21, and all claims respectively depending therefrom, are patentable over *Chen*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and the claims allowed.

B. Claims 1, 2, 5, 7, 8 and 16

Claims 1, 2, 5, 7, 8 and 16 stand rejected as being anticipated by United States Patent No. 6,383,244, issued May 7, 2002, to *Wake, et al.*, (hereinafter referred to as "*Wake*"). In response, the Applicant has amended claim 1 to more clearly recite aspects of the invention.

Independent claim 1, as amended, recites limitations not taught or suggested by *Wake*. *Wake* teaches filter assembly having filter element 24 potted in a soft compressible urethane end caps 42, 44. The frame biases the end caps 42, 44 towards each other, and as such, the end caps bias opposite edges of a media pack towards each other. However, *Wake* does not teach or suggest a first compressible seal element disposed on a first side of an edge of a media pack and engaged with a frame assembly, and a second seal element disposed on a second side of the edge of the media pack and engaged with the frame assembly, wherein the second seal member biases the edge of the media pack against the first seal element, as recited by claim 1.

Thus, the Applicant submits that independent claim 1, and all claims respectively depending therefrom, are patentable over *Wake*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and the claims allowed.

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C. Claims 22 and 24

Claims 22 and 24 stand rejected as being anticipated by *Chen*. In response, the Applicant has amended claim 22 to more clearly recite aspects of the invention.

Independent claim 22, as amended, recite limitations not taught or suggested by *Chen*. As discussed above, the embodiment of *Chen* cited by the Examiner teaches filter assembly having two plates 31, 32 mounted to the upper and lower edges of a filter sheet 29. The plates 31, 32 do not completely engage the pleats of the filter sheet 29 in a manner that form a seal. Moreover, the plates are not taught or suggested as being compressible, particularly in light of the embodiment depicted in Figures 1-6 and 9-10, wherein the similar structure is part of a rigid frame. Therefore, *Chen* does not teach or suggest compressing an edge of a filter media pack between a first and second seal member, wherein at least one of the first or second seal members is compressible, as recited by claim 22.

Thus, the Applicant submits that independent claim 22, and claim 23 depending therefrom, are patentable over *Chen*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and the claims allowed.

D. Claims 22 and 23

Claims 22 and 23 stand rejected as being anticipated by United States Patent No. 6,740,136, issued May 25, 2004, to *Duffy* (hereinafter referred to as "*Duffy*"). In response, the Applicant has amended claim 22 to more clearly recite aspects of the invention.

Independent claim 22, as amended, recite limitations not taught or suggested by *Duffy*. *Duffy* teaches filter assembly having side engagements 24, 28 that pinch and compress filtration media around its edges. However, the engagements 24, 28 are part of the support frame 16 and hold down frame 18, both of which are part the filter frame 14. The frame components, e.g., the support frame 16 and hold down frame 18, are not taught as compressible and snap together. Therefore, *Duffy* does not teach or suggest compressing an edge

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of a filter media pack between a first and second seal member, wherein at least one of the first or second seal members is compressible, as recited by claim 22.

Thus, the Applicant submits that independent claim 22, and claim 23 depending therefrom, are patentable over *Duffy*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and the claims allowed.

E. Claim 28

Claim 28 stands rejected as being anticipated by *Chen*. In response, the Applicant has amended claim 28 to more clearly recite aspects of the invention.

Independent claim 28, as amended, recite limitations not taught or suggested by *Chen*. As discussed above, the plates 31, 32 of *Chen* do not completely engage the pleats of the filter sheet 29 in a manner that form a seal. Moreover, the plates are not taught or suggested as being compressible. Therefore, *Chen* does not teach or suggest inserting a pleated filter media pack into a filter frame, inserting a first seal member into the filter frame proximate a first open edge of the filter media pack, clamping the first open edge of the filter media pack between the first seal member and a second compressible seal member, as recited by claim 28.

Thus, the Applicant submits that independent claim 28 is patentable over *Chen*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and claim 28 allowed.

F. 35 U.S.C. §103(a) Claim 6

Claim 6 stands rejected as being unpatentable over *Chen* in view of United States Patent No. 4,617,122 issued October 14, 1986 to *Kruse, et al* (hereinafter referred to as "*Kruse*"). In response, the Applicant has amended claim 1, from which claim 6 depends, to more clearly recite aspects of the invention.

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Independent claim 1, as amended, recite limitations not taught or suggested by the combination of *Chen* and *Kruse*. As discussed above, *Chen* does not teach or suggest the limitations recited by claim 1. *Kruse* teaches a filter assembly similar to that of *Chen*, wherein projections 30, 50, extending from respective sides of a frame 40, compress a filter media 60 therebetween. However, *Kruse* does not teach or suggest that the projections are compressible. Therefore, *Kruse* does not teach or suggest any modification to the filter of *Chen* which would yield a filter assembly having a compressible seal element, as recited by claim 1.

Thus, the Applicant submits that claim 6, that depends from claim 1, is patentable over *Chen* in view of *Kruse*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and claim 6 allowed.

G. Claim 15

Claim 15 stands rejected as being unpatentable over *Chen* in view of United States Patent No. 5,620,505, issued April 15, 1997, to *Koch, et al.* (hereinafter referred to as "*Koch*"). In response, the Applicant has amended claim 1, from which claim 15 depends, to more clearly recite aspects of the invention.

Independent claim 1, as amended, recite limitations not taught or suggested by the combination of *Chen* and *Koch*. As discussed above, *Chen* does not teach or suggest the limitations recited by claim 1. *Koch* teaches a filter assembly having strips 15, 16 of filter material adhesively bonded to a filter insert 11. The strips 15, 16 seal against a gasket 17. However, *Koch* does not teach or suggest a first compressible seal element disposed on a first side of an edge of a media pack and engaged with a frame assembly, and a second seal element disposed on a second side of the edge of the media pack and engaged with the frame assembly, wherein the second seal member biases the edge of the media pack against the first seal element, as recited by claim 1. Therefore, *Koch* does not teach or suggest any modification to the filter of *Chen* which would yield a

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filter assembly having a seal elements disposed on either side of a edge of a media pack, wherein one seal element is compressible, as recited by claim 1.

Thus, the Applicant submits that claim 15, that depends from claim 1, is patentable over *Chen* in view of *Koch*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and claim 15 allowed.

H. Claim 20

Claim 20 stands rejected as being unpatentable over *Chen* in view of United States Patent No. 6,074,450, issued June 13, 2000, to *Raber* (hereinafter referred to as "*Raber*"). In response, the Applicant has amended claim 1, from which claim 20 depends, to more clearly recite aspects of the invention.

Independent claim 1, as amended, recite limitations not taught or suggested by the combination of *Chen* and *Raber*. As discussed above, *Chen* does not teach or suggest the limitations recited by claim 1. *Raber* teaches a filter assembly having a grille. However, *Raber* does not teach or suggest a first compressible seal element disposed on a first side of an edge of a media pack and engaged with a frame assembly, and a second seal element disposed on a second side of the edge of the media pack and engaged with the frame assembly, wherein the second seal member biases the edge of the media pack against the first seal element, as recited by claim 1. Therefore, *Raber* does not teach or suggest any modification to the filter of *Chen* which would yield a filter assembly having a seal elements disposed on either side of a edge of a media pack, wherein one seal element is compressible, as recited by claim 1.

Thus, the Applicant submits that claim 20, that depends from claim 1, is patentable over *Chen* in view of *Raber*. Accordingly, the Applicant respectfully requests the rejection be withdrawn and claim 20 allowed.

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ALLOWABLE SUBJECT MATTER

The Applicant thanks the Examiner for his comments regarding the allowability of claims 10-11 and 25-27 if re-written in independent form. However, in view of the amendment and arguments set forth above, the Applicant believes base claims 1 and 22 (and all intervening claims) are in allowable form, and as such, claims 10-11 and 25-27 are also in condition for allowance as they now stand.


CONCLUSION

Thus, the Applicant submits that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issuance are earnestly solicited.

If, however, the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Mr. Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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